

## FRANCHISEE APPLICANTS - Privacy notice

Last updated: 24.11.2021

### Quick links

We recommend that you read this Privacy Notice in full to ensure you are fully informed. However, if you only want to access a particular section, then you can click on the relevant link below to jump to that section.

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### 1. What does this notice cover?

This notice describes how Getir Germany GmbH, Getir France SAS, and Getir UK Limited ("**Getir**", "**we**", "**us**" or "**our**") uses your personal data in connection with your application to be a Franchisee with us. This notice applies if you are applying in France, Germany or the UK - where necessary we make distinctions between these different jurisdictions. It describes your data protection rights, including a right to object to some of the processing which Getir carries out. More information about your rights, and how to exercise them, is set out in the "**Your choices and rights**" section.

We also may provide you with additional information when we collect personal data, where we feel it would be helpful to provide relevant and timely information or if you become a Franchisee with us.

### 2. What categories of personal data we collect

We collect data from you when you apply to be a Franchisee. In some cases, this varies depending on where you are applying from and we indicate below how this varies between country.

| Categories of data collected  | Germany | France | UK |
|---|---------|--------|----|
| <b>Basic information:</b> your name, home address, phone number; email address; date of birth, gender   | X       | X      | X  |
| <b>ID information:</b> your passport, ID card, or working permit  | X       | X      | X  |
| <b>Application information:</b> curriculum vitae (CV), employment history, education history, languages spoken, qualifications and skills, desired remunerations, interests and aspirations | X       | X      | X  |
| <b>Background information:</b> criminal background, credit history, income tax declarations, any important public functions   | X       | X      | X  |
| <b>Income information:</b> past income and expected earnings for the role   | X       | X      | X  |
| <b>Bank details:</b> RIB/IBAN numbers   | -       | X      | X  |
| <b>Business partners:</b> their name and role   | X       | X      | X  |

We collect most of this information from you directly. For example, data is collected through our application pages; documents you submit to us like your CV and ID information; from correspondence with you; or through interviews, meetings or other assessments. We also collect some information (i.e. standard anti-bribery/anti-corruption information, adverse financial check, court searches, , criminal background check, credit score check) about you from other people (e.g. from our third-party background screening providers during the pre-contractual screening process). We or our background screening providers will collect publicly available information from social media providers (such as LinkedIn) and certain online marketplaces (such as Amazon, eBay, and Facebook Marketplace).

### **3. Why we collect, use and store this personal data**

We have to have a legal basis to process your data. We set each of these legal bases below, explain what they are, and assign a letter to each so that you can understand which legal basis we are relying on to process your data. The section below then explains the purposes for which we process your data, the processing operations that we carry out, and the categories of data that we use in each case.

#### **Legal basis**

**A) Contractual performance** – when you apply to be a Franchisee we have to consider your application. To do this we have to use your data.

**B) Legitimate interest** – there are instances where we have a legitimate interest to use your data. Our legitimate interest will vary depending on what we are using your data for, and we explain below what the interest is and how it relates to the processing operations that we are carrying out. Where we process personal data on the basis of a legitimate interest, then – as required by data protection law – we have carried out a balancing test to document our interests, to consider what the impact of the processing will be on individuals and to determine whether individuals' interests outweigh our interests in the processing taking place. You can obtain more information about this balancing test by using the contact details at the end of the notice.

**C) Legal obligation** – we have obligations to comply with legal, regulatory and other requirements under UK, EU or Member State laws. In certain cases, we will have to use your data to meet these obligations.

**D) Consent** – in certain circumstances we process your data where you have given us your consent to do so. Where this is the case you have the right to withdraw your consent at any time.

#### **Purposes**

We have set out below why we process your data and explain what data we use in each case:

##### **Assessing your eligibility to be a Franchisee – A**

We collect and use your personal data so that we can process your application to be a Franchisee. We store, and where needed, alter, your personal information to make informed decisions on recruitment and assess your suitability for the role, to communicate with you about your application, to respond to your inquiries and schedule interviews, and reimburse you for any agreed expenses incurred in the application process.

To do this we use your Basic information, ID information, Application information, Income information (and in France only), Bank details and Business partners.

##### **Verifying information and suitability – B / D**

We carry out appropriate checks to verify the information provided by candidates. We verify the details you have supplied and, where applicable, conduct pre-contractual background checks. This includes

1. Anti-Bribery/Anti-Corruption checks;
2. Adverse Financial Checks;
3. Court Searches;
- 4 Criminal checks;
5. Disclosure and Barring Service (DBS) checks (only in the UK and with your consent); and
6. Credit Score checks
7. LinkedIn checks
8. Marketplace Platform Searches

In France and Germany, we may ask you for an extract of a criminal check document during your Franchisee application process, but we will only record whether or not this has been shown to us and will not copy, store or process this information.

In Germany, we may ask you to provide a copy of your ID information to us. We will ask you to provide a redacted copy (in line with instructions communicated to you at the time), but we will only review that this has been provided and will not copy, store or process this information. If we do need to make a copy will ask for your consent.

We carry out LinkedIn and Marketplace Platform Searches using public information collected from social media providers and certain online marketplaces. When we do this, we rely on our legitimate interest to verify applicants and their business partners. Our LinkedIn checks review if applicants and their business partners have connections with our competitors. Marketplace Platform Searches check if they have public business accounts. We carry out these checks to protect Getir's commercial interests and to verify information provided at interviews. To do this we use your Basic information, ID information, Business partners and Background information.

#### **Compliance with law – C**

Where necessary we use your data to comply with legal, regulatory and other requirements in Germany and France under EU or Member State laws, and in the UK under UK law, by analysing and possibly transmitting your personal information.

To do this we use your Basic information, ID information, Application information, Background information.

#### **4. How we share your personal data**

Personal data will primarily be processed by employees in our Franchise, Legal, Internal Audit and IT departments in the country where you apply to be a Franchisee. In addition, we will also share your personal data with Getir Perakende Lojistik A.Ş. in Turkey ("**Getir Turkey**") in the interests of the Getir group as a whole (e.g. group-wide franchise services and management systems).

Your personal data will be shared with companies providing services, such as technology services including hosting, maintenance, administration and analysis, as well as other agencies and third-party due diligence providers, under contract to Getir as part of the Franchisee recruitment process.

Your personal data also will be shared with government authorities and/or law enforcement officials if mandated by law or if required for the protection of our legitimate interests in compliance with applicable laws.

In the event that a Getir business is sold or integrated with another business, your details may be disclosed to our advisers and any prospective purchaser's adviser and will be passed to the new owners of the business.

#### **5. Where we transfer your personal data**

Getir's IT systems are hosted on Amazon Web Services Frankfurt (Germany) and Google EU data centers.

With that being said, as Getir Turkey plays a vital role in our group structure, especially in respect of the group-wide IT, management and legal operations, Getir Turkey employees can access the information listed at section 2. Neither the European Commission (if you are applying in Germany or France,) nor the UK government (if you are applying the UK) has an adequacy decision in place for transfers to Turkey. As such, when we transfer your data to Turkey we rely on Standard Contractual Clauses (SCCs) for such transfers:

If we transfer your data from Germany or France, we rely on the European Commission 2021 SCCs which can be accessed [here](#).

If we transfer your data from the UK, we rely on the European Commission 2004 and 2010 SCCs which can be accessed [here](#) and [here](#) respectively.

We also transfer your personal data to some vendors which host or access personal data outside of the EEA in which case we take steps to ensure your data is adequately protected using the above-mentioned European Commission 2021 SCCs.

A copy of the relevant mechanism can be obtained for your review on request by using the contact details below.

#### **6. Your choices and rights**

You have the right to **ask Getir for a copy** of your personal data; to **correct, delete** or **restrict** processing of your personal data; and to **obtain the personal data you provide in a structured, machine readable format**. In addition, you can **object to the processing** of your personal data in some circumstances (in particular, where we don't have to process the data to meet a contractual or other legal requirement). Where we have asked for your consent, you may withdraw consent at any time. In France, you also have the right to issue instructions for the managing of your personal data after death.

These **rights may be limited**, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law or have compelling legitimate interests to keep. If you ask to withdraw your consent to Getir processing your data, this will not affect any processing which has already taken place at that time. If you have unresolved concerns, you have the **right to complain** to your local data protection authority.

Where a field is marked as mandatory, please provide the requested information otherwise we will not be able to process your application. In all other cases, provision of the requested personal data is optional.

## 7. How long we retain your personal data

**If you are successful:** we will retain your personal data only for as long as we need it for Getir's legitimate interest in accordance with applicable law, for the purposes of the recruitment process and, once this process is finished, for an appropriate period so as to be able to deal with any legal claims linked to the application process. Recruitment records for successful applicants are generally kept for the duration of our Franchisee relationship with you, plus the statute of limitation period in the country where you apply:

In Germany, this is the duration of our Franchisee relationship plus three (3) years, unless we have statutory retention obligations or rights that allow for longer retention periods.

In France, this is the duration of our Franchisee relationship plus five (5) years, unless we have statutory retention obligations or rights that allow for longer retention periods.

In the UK, this is the duration of our Franchisee relationship plus seven (7) years, unless we have statutory retention obligations or rights that allow for longer retention periods.

After this period, we will take steps to delete your personal data or hold it in a form that no longer identifies you. If you become a Getir Franchisee, relevant personal information you provide will become a part of your franchisee file and may be used later for the management of our relationship with you as a Franchisee.

### **If you are not successful:**

In Germany, we will retain your personal data for up to six (6) months after our last contact with you as part of your application, unless you provide your consent for us to store your data for future franchise opportunities.

In France, we will retain your personal data for up to two (2) years after our last contact with you as part of your application, unless you provide your consent for us to store your data for future franchise opportunities.

In the UK, we will retain your personal data for up to six (6) months after our last contact with you as part of your application, unless you provide your consent for us to store your data for future franchise opportunities.

## 8. Updates to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

## 9. Contact us

The data controller for your personal data will depend on where you are applying. If you are applying:

in France, your data controller is **Getir France SAS**;

in Germany, your data controller is **Getir Germany GmbH**; and

in the UK, your data controller is **Getir UK Limited**.

If you have questions about this privacy notice or wish to contact us for any reason in relation to our personal data processing, please contact us at following;

**Email:** [privacy@getir.com](mailto:privacy@getir.com)

### **Getir France SAS**

41 Rue des Alouettes 75019 Paris

### **Getir Germany GmbH**

Postanschrift Alexanderufer 3-7, 10117 Berlin

### **Getir UK Limited**

WeWork, 30 Stamford Street, London, SE1 9LQ

